

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EGYPT HOUSE, Plaintiff,)	Civil Action No.: 25-10597-BEM
)	
)	
v.)	
)	
JOHN P. KELLEY, <i>et al.</i> ,)	ORAL ARGUMENT REQUESTED
Defendants.)	

EMERGENCY MOTION FOR IMMEDIATE HEARING AND EXPEDITED RULING

This motion is made pursuant to USCS Fed Rules Civ Proc R 7, Local Rule 7.1(d), and USCS Fed Rules Civ Proc R 65. To the extent required regarding the ex parte nature of this filing, Plaintiff respectfully requests oral argument on this Emergency Motion for Immediate Hearing. The constitutional violations and urgent circumstances requiring immediate judicial intervention warrant oral presentation to assist the Court’s scheduling determination. Plaintiff Egypt House respectfully moves this Court for an immediate hearing on its Emergency Motion for Temporary Restraining Order and Preliminary Injunction with Incorporated Memorandum of Law filed contemporaneous herewith. The Massachusetts Appellate Tax Board hearing scheduled for November 12, 2025, creates urgent circumstances requiring immediate judicial intervention to prevent irreparable harm to Plaintiff’s constitutional rights.

The undersigned certifies as follows:

1. This matter involves urgent circumstances requiring immediate judicial attention to prevent irreparable harm to constitutional rights;
2. Plaintiff has made good faith efforts to resolve these matters without Court intervention, but Defendants’ escalating pattern of harassment makes resolution impossible;
3. Counsel is available for hearing at the Court’s earliest convenience and will make all necessary arrangements to accommodate the Court’s schedule; and

4. Plaintiff's witnesses, including Father Andrew (Bushell), are available to testify on short notice if required.

Given the irreparable harm occurring daily through continued possession of the photographs and the approaching November 12 deadline, Plaintiff respectfully requests expedited consideration and ruling on this motion.

WHEREFORE, Plaintiff respectfully requests this Court consider the following emergency hearing options:

1. Option A - Ex Parte TRO Hearing: Consider this matter on an ex parte basis without notice to Defendants pursuant to Fed. R. Civ. P. 65(b)(1), given the risk of immediate dissemination if Defendants receive advance notice; provided the Court determines after consideration of Plaintiff's Emergency Motion for Temporary Restraining Order filed contemporaneous herewith, notice would risk immediate dissemination of the July 23rd photographic images;
2. Option B - Expedited Notice Hearing: Within 48-72 hours with abbreviated notice to Defendants via email and telephone, followed by temporary restraining hearing within 7 days;
3. Option C – TRO Hearing: Within 5 business days to consider issuance of a temporary restraining order with full briefing; and
4. Grant such other relief as justice requires.

DATED: October 15, 2025

/s/Tracey M.A. Stockton
Tracey M.A. Stockton (MA Bar No.: 568495)
Admitted before the United States District Court,
Massachusetts District Counsel for Plaintiff
Counsel for Plaintiff